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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANELLE BLANGERES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNITED STATES SEAMLESS, INC.,
and KAYCAN LIMITED,

Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
*PRO HAC VICE***

Michael McShane (the "Applicant") hereby moves the Court to enter an order permitting him to participate in this case *Pro Hac Vice* as counsel for Plaintiffs Robert and Danelle Blangeres ("Plaintiffs"), pursuant to Local Rule 83.2(c). In support of this Motion, the Applicant states as follows:

1 1. The Applicant is a partner in the law firm of Audet & Partners, LLP,
2 in San Francisco, California.

3 2. The Applicant is a member in good standing of the bars of several
4 United States federal courts, the highest state court of Maryland.
5

6 3. The Applicant does not reside in the State of Washington and does
7 not maintain an office in the State of Washington.
8

9 4. The Applicant responds to the information requested in Local Rule
10 83.2(c)(2) as follows:

11 (a) The Applicant's address and telephone number are 221 Main
12 Street, Suite 1460, San Francisco, California, 94105; telephone (415) 568-2555;
13 facsimile (415) 568-2556; email: mmcshane@audetlaw.com.
14

15 (b) The dates of admission to practice before other courts are
16 listed below:
17

<u>State Bar Admissions</u>	<u>Date Admitted</u>
California	06/17/1987

<u>Federal Bar Admissions</u>	<u>Date Admitted</u>
N.D. California	06/17/1987

21 (c) The name, address and telephone number of admitted counsel
22 with whom the Applicant will be associated are: Beth E. Terrell and Erika L.
23
24
25
26

1 Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite
2 300, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206)
3 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.

4
5 (d) The Applicant's appearance is necessary because Plaintiffs in
6 this action have retained him in this action.

7
8 (e) There are no disciplinary sanction actions pending against the
9 Applicant and the Applicant has never been subject to any disciplinary sanctions
10 by any court or Bar Association.

11
12 5. The Applicant understands that if he is admitted *Pro Hac Vice* he
13 will be subject to the disciplinary jurisdiction of this Court.


14
15 6. The Applicant is familiar with the facts, issues and documents
16 associated with this case.

17
18 7. The Applicant is familiar with the local rules of this Court.

19
20 WHEREFORE, Michael McShane respectfully requests that the Court
21 enter an order in the form proposed granting the admission *Pro Hac Vice* of
22 Michael McShane during the pendency of this case.

23
24 I declare under penalty of perjury under the laws of the United States of
25 America that the foregoing is true and correct.

26 Dated: 8-22-13


Michael McShane, Applicant

STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that Erika L. Nusser and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Michael McShane is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 22nd day of August, 2013.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759
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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on August 22, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 22nd day of August, 2013.

2
3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

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13 *Attorneys for Plaintiff*
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